



TRINITY COUNTY

Board of Supervisors
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Paul Dabbs
Statewide Planning Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

July 19, 2005

RE: Public Review Draft of California Water Plan Update, Bulletin 160-05

Dear Mr. Dabbs,

Trinity County believes that planners, policymakers, and members of the public will find the 2005 Update of the California Water Plan helpful both as an aid to understanding and as a guide to better management of California's water resources. We welcome the emphasis on water quality, water-use efficiency, environmental stewardship, fairness, and the public trust; and we regard the approach that this Update takes to changing conditions as much more realistic than the "gap-analysis" attempted in previous Updates. We offer the following comments in hopes of helping make the promising draft into a more fully satisfactory final version.

- We realize that Bulletin 160 is the responsibility of the Department of Water Resources, but without any commitment from other state agencies this Update is a DWR plan rather than the State plan which is clearly needed. We suggest that the final version present in the Chapter 5 Implementation Plan the contributions that other agencies including the State Water Resources Control Board, the Regional Boards, and the Department of Fish and Game propose to make towards the Update's goals and objectives. We regard this as a modest and appropriate suggestion under a governor who was elected in part on a pledge to "blow up boxes".
- The Draft Framework for Action does not make clear how the State will work to improve water quality, water use efficiency, and environmental stewardship in cases (including the Klamath basin) where state management and oversight is acknowledged to be necessary. Many of the issues in the Klamath basin are inter-regional or inter-state, and cannot be cured solely with the Regional Water Management proposed as Initiative 1. In theory, the required state leadership should be discussed under the "Improve State Water Management Systems" proposed as

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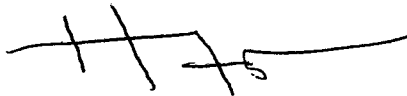
WENDY REISS
DISTRICT 5

Initiative 2, but the only state proposals in Initiative 2 are physical infrastructure improvements and CalFed activities that are inapplicable to the Klamath basin. We request that a third Initiative be included to describe the efforts that the state will undertake beyond infrastructure improvements to improve water quality, water-use efficiency, and environmental stewardship.

- Trinity County is interested in the Initiative 2 proposal to "Sustain the Delta", as more than half of the flow of the Trinity River at Lewiston continues to be diverted to the Delta even as we work towards Trinity fisheries restoration. The text indicates that measures to sustain the Delta will be limited to improvements to Delta levees, but we are convinced that efforts to sustain the delta should also address water quality, pumping rates, invasive species, and other factors. We request that Initiative 2 provide a more complete discussion of what's needed in the Delta. Alternatively, this fourth component of Initiative 2 could be renamed "Improve Delta Levees", but clarification should be provided about how and why this component differs from the other three components (Maintain Aging Facilities, Implement the CalFed Program, and Improve Flood Management).
- The Draft acknowledges that improvements in water use efficiency will be central to any satisfactory water future, and that a satisfactory plan must include performance measures. However, there is no performance measure proposed for improvements in water use efficiency. The Implementation Plan Evaluation Criteria (Table 5-2) would measure demand management only in terms of "Urban, agricultural, or environmental reliability", which would not necessarily show changes in water use efficiency. Since "Use Water Efficiently" is important enough to be presented as one of the three "foundational actions" for the Plan, we suggest that improvements in efficiency be monitored directly and included among the evaluation criteria..
- The North Coast regional report in Volume 3 and the associated summary in Volume 1 fail to adequately describe the water quality challenges on the Klamath-Trinity River system. We request a fuller discussion of this important issue in the final draft.

Thank you for your consideration of these comments,

Sincerely,

A handwritten signature in black ink, appearing to read "H. Freeman", with a long horizontal stroke extending to the right.

Howard Freeman, Chairman
Trinity County Board of Supervisors